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BY ECF

March 13, 2025

The Honorable Pamela K. Chen
United States District Judge
United States District Court, Eastern District
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Securities Exchange Commission v. Xia, et al.* U.S. Dist. Ct., Dkt. No. 21-Civ-5350 (PKC) (JAM)

Dear Judge Chen,

We represent Defendants Richard Xia (“Xia”) and Fleet New York Metropolitan Regional Center, LLC (“Fleet”) in the above-referenced matter. Pursuant to the February 12, 2025 Conference the Court’s directive, and Plaintiff the Securities and Exchange Commission’s (“SEC”) draft Proposed Order (ECF No. 557-1), we respectfully submit Mr. John Leo’s modification to the SEC’s draft Proposed Order, which reflects Mr. Leo’s proposed structure for acquiring the regional center. Specifically, Community Housing Association LLC (“CHA”), a single-member LLC, will acquire Fleet, with RC One SH LLC as its managing member and John Leo as the managing member of RC One SH LLC.

Also attached is a letter from Mr. Leo regarding the proposed modifications and his concerns about other issues related to the investors’ funds.

We appreciate the Court for its attention to this matter.

Respectfully submitted,

/s/ Robert J. Hantman, Esq.
*Attorney for Defendant Xia
and Fleet*

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